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8 BEFORE THE FAIR POLITICAL PRACTICES COMMISSION  
9 STATE OF CALIFORNIA  
10

11 In the Matter of	)	FPPC No.: 05/527
	)	
12 NO ON 54: TEACHERS, WORKERS,	)	STIPULATION, DECISION and
13 HEALTHCARE, CIVIL LIBERTIES &	)	ORDER
14 ENTERTAINMENT GROUPS, and ABDI SOLTANI,	)	
15	)	
16 Respondents.	)	
17	)	

18 Complainant, Roman G. Porter, Executive Director of the Fair Political Practices Commission,  
19 and Respondents No on 54: Teachers, Workers, Healthcare, Civil Liberties & Entertainment Groups and  
20 Abdi Soltani hereby agree that this Stipulation will be submitted for consideration by the Fair Political  
21 Practices Commission at its next regularly scheduled meeting.

22 The parties agree to enter into this Stipulation to resolve all factual and legal issues raised in this  
23 matter, and to reach a final disposition without the necessity of holding an administrative hearing to  
24 determine the liability of Respondents.

25 Respondents understand and hereby knowingly and voluntarily waive, any and all procedural  
26 rights set forth in Sections 83115.5, 11503 and 11523 of the Government Code, and in Sections 18361.1  
27 through 18361.9 of Title 2 of the California Code of Regulations. This includes, but is not limited to,  
28 the right to personally appear at any administrative hearing held in this matter, to be represented by an

1 attorney at Respondents' own expense, to confront and cross-examine all witnesses testifying at the  
2 hearing, to subpoena witnesses to testify at the hearing, to have an impartial administrative law judge  
3 preside over the hearing as a hearing officer, and to have the matter judicially reviewed.

4 It is further stipulated and agreed that Respondents No on 54: Teachers, Workers, Healthcare,  
5 Civil Liberties & Entertainment Groups and Abdi Soltani violated the Political Reform Act by failing to  
6 timely file election cycle reports online in 2003, in violation of Section 85309, subdivision (b) of the  
7 Government Code (4 counts), as described in Exhibit 1, which is attached hereto and incorporated by  
8 reference, as though fully set forth herein. Exhibit 1 is a true and accurate summary of the facts in this  
9 matter.

10 Respondents agree to the issuance of the Decision and Order which is attached hereto.  
11 Respondents also agree to the Commission imposing upon them an administrative penalty in the amount  
12 of Eight Thousand Dollars (\$8,000). A cashier's check from Respondents in said amount, made payable  
13 to the "General Fund of the State of California," is submitted with this stipulation as full payment of the  
14 administrative penalty, and shall be held by the State of California until the Commission issues its  
15 decision and order regarding this matter. The parties agree that in the event the Commission refuses to  
16 accept this stipulation, it shall become null and void, and within fifteen (15) business days after the  
17 Commission meeting at which the stipulation is rejected, all payments tendered by Respondents in  
18 connection with this stipulation shall be reimbursed to Respondents. Respondents further stipulate and  
19 agree that in the event the Commission rejects the stipulation, and a full evidentiary hearing before the  
20 Commission becomes necessary, neither any member of the Commission, nor the Executive Director,  
21 shall be disqualified because of prior consideration of this stipulation.

22  
23 Dated: \_\_\_\_\_

\_\_\_\_\_  
Roman G. Porter  
Executive Director  
Fair Political Practices Commission

24  
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26  
27 Dated: \_\_\_\_\_

\_\_\_\_\_  
Abdi Soltani, individually and on behalf of No on 54:  
Teachers, Workers, Healthcare, Civil Liberties &  
28 Entertainment Groups, Respondents

1 **DECISION AND ORDER**

2 The foregoing stipulation of the parties “In the Matter of No on 54: Teachers, Workers,  
3 Healthcare, Civil Liberties & Entertainment Groups and Abdi Soltani, FPPC No. 05/527,” including all  
4 attached exhibits, is hereby accepted as the final decision and order of the Fair Political Practices  
5 Commission, effective upon execution below by the Chairman.  
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7 IT IS SO ORDERED.  
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9 Dated: \_\_\_\_\_

10 \_\_\_\_\_  
11 Ross Johnson, Chairman  
12 Fair Political Practices Commission  
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